

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

AMERICAN PATENTS LLC,

Plaintiff,
v.

BROADCOM SINGAPORE PTE., LTD.,
BROADCOM INC., AND BROADCOM
CORP.,

Defendants.

C.A. No. 4:22-CV-477-ALM

JURY TRIAL DEMANDED

DECLARATION OF RYAN D. PHILLIPS IN SUPPORT OF BROADCOM INC. AND BROADCOM CORP.'S MOTION TO DISMISS FOR IMPROPER VENUE AND BROADCOM SINGAPORE PTE., LTD.'S MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION

1. I, Ryan D. Phillips, am Director and Managing IP Counsel providing counsel for Broadcom Inc. and other affiliated companies. I am over the age of 18 and have actual knowledge of the statements made herein, and could and would testify to said facts if called to do so in a court of law.

2. Broadcom Inc. is incorporated in Delaware and its principal place of business is in San Jose, California. Broadcom Inc. does not own any real estate in the Eastern District of Texas ("EDTX"), possess or control any physical place in the EDTX, or own or control shelf space in the EDTX.

3. Broadcom Corp. is incorporated in California and its principal place of business is also in San Jose, California. Broadcom Corp. does not own any real

estate in the EDTX, possess or control any physical place in the EDTX, or own or control shelf space in the EDTX.

4. Broadcom Singapore Pte., Ltd. is incorporated in Singapore. As an investment holding company, it does not design, manufacture, have manufactured, sell, offer for sale, or import any products, and did not design, manufacture, have manufactured, sell, offer for sale, or import the Accused Products in the United States or Texas. It does not own any real estate in the United States or Texas, possess or control any physical place in the United States or Texas, own or control shelf space in the United States or Texas, have any employees in United States or Texas, and it does not conduct business of any kind in the United States or Texas. It does not ship products to Texas or conduct any marketing or advertising in, or directed toward, Texas.

5. Broadcom Inc., Broadcom Corp., and Broadcom Singapore Pte., Ltd. are separate entities, and each of them respects the corporate form.

I declare under penalty of perjury that the above statements are true and correct to the best of my knowledge.

Executed on August 15, 2022 in Arapahoe County, Colorado.



Ryan D. Phillips